

### **REMARKS**

The Official Action mailed October 5, 2004, has been received and its contents carefully noted. This response is filed within three months of the mailing date of the Official Action and therefore is believed to be timely without extension of time. Accordingly, the Applicants respectfully submit that this response is being timely filed.

The Applicants note with appreciation the consideration of the Information Disclosure Statement filed on July 19, 2000. A further Information Disclosure Statement is submitted herewith and consideration of this Information Disclosure Statement is respectfully requested.

Claims 1-25 and 29-37 were pending in the present application prior to the above amendment. Claims 23-25 and 35-37 have been canceled, claims 1-9 and 11-20 have been amended to better recite the features of the present invention, and new claims 38-61 have been added to recite additional protection to which the Applicants are entitled. The Applicants note with appreciation the allowance of claims 10, 11, 21 and 22 (page 14, Paper No. 20040930). Accordingly, claims 1-22, 29-34 and 38-61 are now pending in the present application, of which claims 1, 4, 8, 10, 12, 15, 19, 21 and 38-43 are independent. For the reasons set forth in detail below, all claims are believed to be in condition for allowance. Favorable reconsideration is requested.

The specification has been amended to correct minor typographical and grammatical errors.

Figures 10(C) and 14 have been amended to correct minor typographical errors. Specifically, in Figure 10(C), reference numbers 750 and 751 have been deleted and reference number 227 has been corrected to 727. In Figure 14, reference number 108 has been added.

Paragraph 2 of the Official Action rejects claims 1, 2, 8, 12, 13, 19, 23, 25, 29, 31, 32, 34, 35 and 37 as anticipated by U.S. Patent No. 5,812,109 to Kaifu et al. The Applicants respectfully submit that an anticipation rejection cannot be maintained against the independent claims of the present application, as amended.

**Amendments to the Drawings:**

The attached sheets of drawings include changes to Figures 10(C) and 14. As described in detail below, Figures 10(C) and 14 have been amended to correct minor typographical errors. These sheets, which include Figures 10(A)-(C) and 14, replace the original sheets including Figures 10(A)-(C) and 14.

Attachment: Replacement Sheets

As stated in MPEP § 2131, to establish an anticipation rejection, each and every element as set forth in the claim must be described either expressly or inherently in a single prior art reference. Verdegaal Bros. v. Union Oil Co. of California, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987).

Independent claims 1, 4, 8, 12, 15 and 19 and dependent claims 2, 3, 5-7, 9, 13, 14, 16-18 and 20 have been amended to recite that a display device (or a semiconductor device) comprises two driver circuits, that is, a pixel gate signal line side driver circuit and a driver circuit which drives a second active device included in a sensor portion. Kaifu does not teach all the elements of the amended independent claims, either explicitly or inherently.

The Official Action asserts that "Kaifu discloses an embodiment (col. 14, line 53 through col. 17, line 13) that is explained in part by Figures 3, 4A, and 4B (col. 5, line 26 through col. 14, line 52) wherein an integral image recognition/display apparatus comprises: a plurality of pixel portions, (everything in Figure 4A), each having an active device, T11, and arranged in matrix and each having a pixel electrode (left portion in Figure 4B)" comprising aluminum layer 6 and n-doped silicon 5 over an active matrix substrate (pages 2-3, Paper No. 20040930). However, as shown in Figure 3 of Kaifu, both the liquid crystal display element D11 and the photoelectric conversion element S11 are connected to the switching element T11. In other words, Kaifu's pixel portion and sensor portion have only one element for driving. Therefore, the Applicants respectfully submit that Kaifu does not teach that a display device (or a semiconductor device) comprises two driver circuits, that is, a pixel gate signal line side driver circuit and a driver circuit which drives a second active device included in a sensor portion, either explicitly or inherently.

Since Kaifu does not teach all the elements of the independent claims, either explicitly or inherently, an anticipation rejection cannot be maintained. Accordingly, reconsideration and withdrawal of the rejections under 35 U.S.C. § 102 are in order and respectfully requested.

Paragraph 3 of the Official Action rejects claims 3-7, 9, 14-18, 20, 24, 30, 33 and 36 as obvious based on the combination of Kaifu and U.S. Patent No. 5,585,817 to Itoh et al. The Applicants respectfully submit that a *prima facie* case of obviousness cannot be maintained against the independent claims of the present application, as amended.

As stated in MPEP §§ 2142-2143.01, to establish a *prima facie* case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations. Obviousness can only be established by combining or modifying the teachings of the prior art to produce the claimed invention where there is some teaching, suggestion, or motivation to do so found either explicitly or implicitly in the references themselves or in the knowledge generally available to one of ordinary skill in the art. "The test for an implicit showing is what the combined teachings, knowledge of one of ordinary skill in the art, and the nature of the problem to be solved as a whole would have suggested to those of ordinary skill in the art." In re Kotzab, 217 F.3d 1365, 1370, 55 USPQ2d 1313, 1317 (Fed. Cir. 2000). See also In re Fine, 837 F.2d 1071, 5 USPQ2d 1596 (Fed. Cir. 1988); In re Jones, 958 F.2d 347, 21 USPQ2d 1941 (Fed. Cir. 1992).

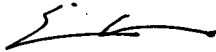
Please incorporate the arguments above with respect to the deficiencies in Kaifu. Itoh does not cure the deficiencies in Kaifu. The Official Action relies on Itoh to allegedly teach a top gate type TFT (page 8, Paper No. 20040930). However, Kaifu and Itoh, either alone or in combination, do not teach or suggest that a display device (or a semiconductor device) comprises two driver circuits, that is, a pixel gate signal line side driver circuit and a driver circuit which drives a second active device included in a sensor portion. Since Kaifu and Itoh do not teach or suggest all the claim limitations, a *prima facie* case of obviousness cannot be maintained. Accordingly, reconsideration

and withdrawal of the rejections under 35 U.S.C. § 103(a) are in order and respectfully requested.

New claims 38-61 have been added to recite additional protection to which the Applicants are entitled. New independent claims 38-43 recite that a portion of a first layer is overlapped with a second layer while another portion of the first layer is not covered by the second layer. The Applicants respectfully submit that new claims 38-61 are in condition for allowance.

Should the Examiner believe that anything further would be desirable to place this application in better condition for allowance, the Examiner is invited to contact the undersigned at the telephone number listed below.

Respectfully submitted,

  
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